

Attachment A – Issue Background

When the Conference for Food Protection (CFP) adopted the CFP Standards for the Accreditation of Food Protection Manager Certification Programs, there were no suitable existing standards in place. The Conference explored other standards available at the time including the National Commission for Certifying Agencies (NCCAs) Standards for the Accreditation of Certification Programs but found none of them to be acceptable for use by the Conference. Therefore, the Conference developed its own standard.

Once a standard has been developed, it must be maintained on an ongoing basis. This requires a dedicated group of individuals and standards experts who not only understand the history of the standard in question, but also the standards development and maintenance process. The Food Manager Certification Committee has admirably stepped up to maintain the standard but with a limited number of committee participants experienced in standards development and/or a good understanding of the history of the standard, the conference would be better served by the use of a professional and world-wide accepted standard developed and maintained by an international standards organization.

Since the Conference developed its standard, an International Standard developed by the International Organization for Standardization (ISO) has been developed. This standard, ISO/IEC 17024 – Conformity Assessment: General Requirements for Bodies Operating Certification of Persons, has the power of a worldwide accepted standards development organization (ISO) behind it. Additionally, because it is an international standard, it has worldwide acceptance. Organizations such as the Global Food Safety Initiative (GFSI) are referencing this standard as a normative document in the development of their own standards for the competence of auditors.

ISO/IEC 17024 is not only maintained by an international group of standard experts and adopted by governments in countries all over the world, it is even being adopted by U.S. governmental agencies. The Food and Drug Administration (FDA), Office of Regulatory Affairs (ORA), Department of Human Resource Development (DHRD) is currently developing training and professional certification for a range of occupational positions. FDA has contracted for the development of personnel certification programs that will meet or exceed the requirements of ISO/IEC 17024 and that will be accreditable by the American National Standards Institute (ANSI) against ISO/IEC 17024. Additionally, other U.S. Governmental agencies (Department of Defense, Department of Labor, and Department of Energy) have officially recognized ANSI and ISO/IEC 17024 as the one accrediting body and personnel certification standard, by which it judges the quality and validity of all personnel certification programs.

ISO/IEC 17024 is sufficiently similar to the CFP Standards for accreditation of food protection manager programs in content, to substitute one for the other. Organizations meeting the CFP standard would have little difficulty meeting the ISO/IEC 17024 standard. And personnel certification organizations accredited against the ISO/IEC 17024 standard would not only find their programs accepted in the United States, but would potentially find them accepted world-wide. These programs would have the ability to join the Multi-Lateral Agreement (MLA) being developed by the International Accreditation Forum (IAF) for mutual recognition by Accrediting Bodies in all countries party to the MLA. For example, a Food Protection Manager accredited by ANSI against ISO/IEC 17024, could find acceptance in the United Kingdom by the ANSI partner in the United Kingdom, the United Kingdom Accreditation Service (UKAS).

World-wide acceptance is going to become the requirement of the future. U.S. only based accreditation will eventually be phased out as governments work towards the transportability of foods, supplies and people. More and more governments, including the U.S. Government are going to work towards international standards and international accreditation against those standards.

Adoption of ISO/IEC 17024 in lieu of the CFP standard will turn maintenance of the standard over to a professional standards organization and will allow the conference to concentrate on issues within its expertise. It will also move the conference towards a world-accepted standard and the use of a standard that the United States government is already in the process of adopting. End users of manager certification (managers, regulators, employers, the public) can all be confident that the world's best standard for personnel certification programs is being applied and the world's best accrediting body (ANSI) is accrediting those certification programs against that standard.

ANSI serves as the accrediting body for both standards. The transition of accreditation from the CFP standard to the ISO standard could be accomplished very easily due to the fact that ANSI is the accreditor of both standards. The Conference would maintain control by specifying the conditions under which the ISO standard would be accepted in lieu of the CFP standard. The conference would always have the right to revert back to its own standard at some future point should it determine the ISO standard is no longer in the best interest of the food industry.

Because only one of the providers has been accredited by ANSI against both requirements, this submitter is aware that a generous timeline should be adopted to allow all interested organizations to become accredited by ANSI against ISO/IEC 17024. Therefore, the Conference Food Manager Certification Committee should be tasked with developing a transition plan that slowly transitions from the CFP standard to the ISO standard.

One suggestion is to offer a 6 year transition plan similar to what is described below:

Immediately – CFP recognizes ISO/IEC 17024 as equivalent to the CFP Standard for Accreditation of Food Protection Manager Certification Programs. Thus Certification Bodies accredited by ANSI against ISO/IEC 17024 are immediately granted accreditation by ANSI against the CFP standard without undergoing a separate and additional accreditation audit.

Years 1-2 – ANSI continues to accredit Certification Bodies to the CFP standard and the conference continues to maintain the standard. ANSI conducts workshops to interested CFP accredited certification bodies and other interested parties on the similarities of the two standards and any additional requirements that might need to be met to become accredited under ISO/IEC 17024. ANSI begins accrediting Certification Bodies against ISO/IEC 17024. Those Certification Bodies accredited, are immediately deemed to meet CFP and no longer need to submit separate application for CFP accreditation.

Years 2-4 – Food Protection Manager Certification Bodies apply for and achieve accreditation by ANSI against ISO/IEC 17024. ANSI continues to maintain both programs.

Year 5-6 – ANSI phases out accreditation against the CFP standard. Any Certification Body not accredited by ANSI against ISO/IEC 17024 will cease to be accredited by ANSI at the end of the term of their accreditation.